

Fee Bills for Wills Law Firm, PLLC  
Civil Action No. 3:15-cv-00048; *Bobby Rouse, et al., v. Target Corporation*

<b>Timekeeper &amp; Rate</b>	<b>Task</b>	<b>Time</b>	<b>Total</b>
RHW \$500	Initial meetings with Bobby Rouse (2)	2.50	\$1250.00
RHW \$500	Research, prepare and file Plaintiffs' Original Complaint	4.25	\$2125.00
RHW \$500	Prepare and file Notices of Consent	.50	\$250.00
RHW \$500	Review Order for Conference and Disclosure of Interested Parties	.25	\$125.00
RHW \$500	Review Motion for Jeffrey D. Wohl to Appear Pro Hac Vice and to Appear as Attorney-In-Charge	.25	\$125.00
RHW \$500	Review Motion for Peter A. Cooper to Appear Pro Hac Vice	.25	\$125.00
RHW \$500	Review Motion for Claire Hoffman to Appear Pro Hac Vice	.25	\$125.00
RHW \$500	Review Order Granting Motion for Jeffrey D. Wohl to Appear Pro Hac Vice	.25	\$125.00
RHW \$500	Review Order Granting Motion for Peter A. Cooper to Appear Pro Hac Vice	.25	\$125.00
RHW \$500	Review Order Granting Motion for Claire Hoffman to Appear Pro Hac Vice	.25	\$125.00
RHW \$500	Review Defendant's Answer to Plaintiff's Original Complaint and prepare memo regarding legal research regarding same	1.50	\$750.00
RHW \$500	Review Defendants' Certificated of Interested Parties	.25	\$125.00
RHW \$500	Review Defendants' Corporate Disclosure Statement	.25	\$125.00
RHW \$500	Review Notice of Reassignment to USDC Judge George C. Hanks	.25	\$125.00
RHW \$500	Review Order for Conference and Disclosure of Interested Parties	.25	\$125.00
RHW \$500	Review Defendant's Supplemental Certificate of Interested Parties	.25	\$125.00
RHW \$500	Rule 26 Conference Call with Jeffrey Wohl (05/26/15)	.50	\$250.00
RHW \$500	Rule 26 Conference Call with Jeffrey Wohl (06/01/2015)	.50	\$250.00
RHW \$500	Review Letter regarding Defendant's First Request for Production of Documents and Possible Deposition Dates for Plaintiffs'	.25	\$125.00
RHW \$500	Review letter regarding possible settlement of plaintiffs' claims (6/3/15)	.75	\$375.00
RHW \$500	Legal research and analysis re exemptions	3.50	\$1750.00
RHW \$500	Prepare damage analysis for plaintiffs	1.50	\$750.00
RHW \$500	Client meeting	1.50	\$750.00

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RHW \$500	Drafted Letter to Defendant regarding Plaintiff's First Request for Production of Documents	.25	\$125.00
RHW \$500	Reviewed and edited Plaintiff's First Request for Production of Documents	.50	\$250.00
RHW \$500	Review Joint Discovery Case Management Plan and make edits	1.25	\$625.00
RHW \$500	Review Letter regarding Deposition Dates for Plaintiffs'	.25	\$125.00
RHW \$500	Drafted Letter to Defendant's regarding Plaintiff's Initial Disclosures,	.25	\$125.00
RHW \$500	Reviewed and edited Plaintiff Bobby Rouse's Objections and Answers to Defendant's First Request for Production	1.25	\$625.00
RHW \$500	Reviewed and edited Opt-In Plaintiff Nicole Garza's Objections and Answers to Defendant's First Request for Production	1.25	\$625.00
RHW \$500	Reviewed documents Bates Labeled Target-P000001-Target-P000011	.25	\$125.00
RHW \$500	Review Letter from Defendant's regarding Amended Notices of Deposition for Plaintiff Bobby Rouse and Nicole Garza	.25	\$125.00
RHW \$500	Review Defendant's privilege log	.25	\$125.00
RHW \$500	Conduct research re Defendant's privilege log	1.75	\$875.00
RHW \$500	Prepare and File Letter with Court regarding Request for Discovery Conference	.50	\$250.00
RHW \$500	Attend Pre-Trial and Scheduling Conference with Judge George Hanks in Galveston, Texas (including travel time) (07/08/15)	4.25	\$2125.00
RHW \$500	Telephone Conference Call with Jeffrey Wohl (07/10/15)	.50	\$250.00
RHW \$500	Review Hearing Minutes and Order from Pretrial and Scheduling Conference held on July 8, 2015	.25	\$125.00
RHW \$500	Review Docket Control Order	.25	\$125.00
RHW \$500	Research and begin drafting motion for conditional certification	4.75	\$2375.00
RHW \$500	Telephone Conference with Jeffrey Wohl (07/15/15)	.50	\$250.00
RHW \$500	Review Defendant's Initial Disclosures	.25	\$125.00
RHW \$500	Review Defendant's responses to Plaintiff Bobby Rouse First Request of Production, including 325 documents produced	2.25	\$1125.00
RHW \$500	Review and edit Plaintiff's Opposed Motion for Leave to File Plaintiffs' First Amended Complaint	.25	\$125.00
RHW \$500	Review and edit Plaintiffs' First Amended	.75	\$375.00

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RHW \$500	Review and edit Proposed Order Granting Motion for Leave to File Plaintiffs' First Amended Complaint	.25	\$125.00
RHW \$500	Review Order Granting Motion for Leave to File Plaintiffs' First Amended Complaint	.25	\$125.00
RHW \$500	Review Defendant's proposed protective order	1.0	\$500.00
RHW \$500	Drafted Letter to Defendant regarding Declining of Deposition Dates and Protective Order	.50	\$250.00
RHW \$500	Client meeting	1.0	\$500.00
RHW \$500	Exchange 24 emails with opposing counsel	6.0	\$3000.00
RHW \$500	T/c with client (6)	1.75	\$875.00
RHW \$500	Review Letter from Defendant regarding offer of judgment	.50	\$250.00
	<b>TOTAL FOR RHONDA H. WILLS</b>	<b>53.5</b>	<b>\$26,750.00</b>
GE \$300	Initial telephone consult with Bobby Rouse (02/04/15)	.75	\$225
GE \$300	Initial meeting with Bobby Rouse (02/12/15)	.5	\$150
GE \$300	Research, prepare and file Plaintiffs' Original Complaint with Notices of Consent	8	\$2,400
GE \$300	Review Order for Conference and Disclosure of Interested Parties	.25	\$75
GE \$300	Request for Issuance of Summons	.25	\$75
GE \$300	Drafted Transmittal Letter for Summons	.25	\$75
GE \$300	Prepare and file Plaintiff's Certificate of Interested Parties with Mailed Copy to Registered Agent	.25	\$75
GE \$300	Prepare and File Executed Summons of Target Corporation	.25	\$75
GE \$300	Review Motion for Jeffrey D. Wohl to Appear Pro Hac Vice and to Appear as Attorney-In-Charge	.25	\$75
GE \$300	Review Motion for Peter A. Cooper to Appear Pro Hac Vice	.25	\$75
GE \$300	Review Motion for Claire Hoffman to Appear Pro Hac Vice	.25	\$75
GE \$300	Review Order Granting Motion for Jeffrey D. Wohl to Appear Pro Hac Vice	.25	\$75
GE \$300	Review Order Granting Motion for Peter A. Cooper to Appear Pro Hac Vice	.25	\$75
GE \$300	Review Order Granting Motion for Claire Hoffman to Appear Pro Hac Vice	.25	\$75
GE \$300	Review Defendant's Answer to Plaintiff's Original Complaint	.5	\$150

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GE \$300	Review Defendants' Certificated of Interested Parties	.25	\$75
GE \$300	Review Defendants' Corporate Disclosure Statement	.25	\$75
GE \$300	Initial Telephone Consult with Nicole Garza (04/16/15)	.75	\$225
GE \$300	Prepare and file Notice of Filing Additional Notice of Consent of Nicole Garza	.25	\$75
GE \$300	Review Order for Conference and Disclosure of Interested Parties and Calendar Dates	.25	\$75
GE \$300	Review Defendant's Supplemental Certificate of Interested Parties	.25	\$75
GE \$300	Rule 26 Conference Call with Jeffrey Wohl (06/01/2015)	.5	\$150
GE \$300	Review Letter regarding Defendant's First Request for Production of Documents and Possible Deposition Dates for Plaintiffs'	.25	\$75
GE \$300	Review Letter from Defendant's regarding Settlement	.25	\$75
GE \$300	Review Defendant's Document Production	1.5	\$450
GE \$300	Prepare Damage Model	2.5	\$750
GE \$300	Drafted Plaintiff's First Request for Production of Documents to Defendant and Transmittal Letter	3	\$900
GE \$300	Telephone Call from Claire Hoffman re JDCMP	.25	\$75
GE \$300	Edit and Review Joint Discovery Case Management Plan	3	\$900
GE \$300	Review Letter regarding Deposition Dates for Plaintiffs'	.25	\$75
GE \$300	Telephone Communication with Bobby Rouse re Defendants' Discovery Requests	.25	\$75
GE \$300	Telephone Communication with Nicole Garza re Defendants' Discovery Requests	.5	\$150
GE \$300	Drafted Plaintiff Bobby Rouse's Objections and Answers to Defendant's First Request for Production	4	\$1,200
GE \$300	Drafted Opt-In Plaintiff Nicole Garza's Objections and Answers to Defendant's First Request for Production	4	\$1,200
GE \$300	Review Documents Bates Labeled Target-P000001-Target-P000011	.5	\$150
GE \$300	Drafted Plaintiffs' Initial Disclosures	.5	\$150
GE \$300	Drafted Letter to Defendant's regarding Plaintiff's Initial Disclosures, Discovery, and Production of Documents	.25	\$75

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GE \$300	Prepare and File Letter with Court regarding Request for Discovery Conference	3	\$900
GE \$300	Initial Pre-Trial and Scheduling Conference with Judge George Hanks (07/08/15)	4	\$1,200
GE \$300	Telephone Conference Call with Jeffrey Wohl (07/10/15)	.25	\$75
GE \$300	Review Hearing Minutes and Order from Pretrial and Scheduling Conference held on July 8, 2015	.25	\$75
GE \$300	Review Docket Control Order	.25	\$75
GE \$300	Client Contact with Nicole Garza for Depo Scheduling (07/14/15)	.25	\$75
GE \$300	Client Contact with Bobby Rouse for Depo Scheduling (07/14/15)	.25	\$75
GE \$300	Review Defendant's Initial Disclosures	.25	\$75
GE \$300	Review Defendant's responses to Plaintiff Bobby Rouse First Request of Production	.5	\$150
GE \$300	Prepare and File Plaintiff's Opposed Motion for Leave to File Plaintiffs' First Amended Complaint	.5	\$150
GE \$300	Prepare and File Plaintiffs' First Amended	1	\$300
GE \$300	Prepare and File Proposed Order Granting Motion for Leave to File Plaintiffs' First Amended Complaint	.25	\$75
GE \$300	Review Order Granting Motion for Leave to File Plaintiffs' First Amended Complaint	.25	\$75
GE \$300	Review of Mr. Wohl's Correspondence to Court and Court's responses re Granting of Plaintiffs' First Amended Complaint	.25	\$75
GE \$300	Drafted Letter to Defendant regarding Defendant's Withholding of Witness Statements, Scheduling of 30(b)(6) witness, and Proposed Protective Order	3	\$900
GE \$300	Review of Defendant's Letter re its Position on ETL-AP Declarations, 30(b)(6) Depo, and Protective Order	1	\$300
GE \$300	Correspondence with Mr. Wohl re TV Coverage at Plaintiffs' Depos and Review of Defendant's letter re Media Coverage	.25	\$75
GE \$300	Telephone Conference with Jeffrey Wohl and Claire Hoffman re Defendants' Discovery Disputes (Answers to Plaintiffs' Discovery and Reality TV Show) and Subsequent Email Correspondence	.25	\$75
GE \$300	Meeting with Bobby Rouse re Offer of Judgment	.5	\$150

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GE \$300	Telephone Conference with Nicole Garza re Offer of Judgment	.75	\$225
GE \$300	Email Communication with Jeffrey Wohl re Electronic Service	.25	\$75
	Review Stipulation re Electronic Service		
GE \$300	Review of Defendant's Offer Of Judgment and Legal Research	4.75	\$1,425
	<b>TOTAL FOR GENEVIEVE ESTRADA</b>	<b>58</b>	<b>\$17,400.00</b>
Paralegal \$125	Reviewed 61 documents in Defendant's Document Production	1.00	\$125.00
Paralegal \$125	Indexed 263 documents in Defendant's Document Production	2.50	\$312.50
Paralegal \$125	Marked 11 Documents for Plaintiff's Document Production	17.00	\$2,125.00
Paralegal \$125	Reviewed 11 Documents Produced by Client	.75	\$93.75
Paralegal \$125	Prepared Plaintiff's Pleadings with Court Filed Documents 1-25 and Discovery	1.25	\$156.25
Paralegal \$125	Made 1,624 copies	3.00	\$375.00
Paralegal \$125	Sent 1 fax	.25	\$31.25
Paralegal \$125	Sent 1 Letter via Fedex	.75	\$93.75
Paralegal \$125	Prepare Correspondence to Secretary of State of Texas regarding Service of Process	.75	\$93.75
Paralegal \$125	Prepared Correspondence to CT Corporation regarding Plaintiff's Certificate of Interested Parties	.75	\$93.75
Paralegal \$125	Prepare Correspondence to Jeffrey Wohl, Claire Hoffman and Samuel Cooper(Paul Hastings, LLP- California) and Samuel Cooper and Christie Mathis (Paul Hastings, LLP-Texas) regarding Joint Stipulation regarding Electronic Service	.50	\$62.50
Paralegal \$125	Prepare Correspondence to Jeffrey Wohl, Claire Hoffman and Peter Cooper (Paul Hastings, LLP- California) regarding Plaintiff's Initial Disclosures, Plaintiff Rouse's and Garza's Objections and Answers to Defendant Target 1 <sup>st</sup> Request for Production and Plaintiff Document Production	1.00	\$125.00
Paralegal \$125	Prepared Correspondence to the Honorable Judge George C. Hanks, Jr. regarding Discovery Conference	.50	\$62.50
Paralegal \$125	Prepare Correspondence to Jeffrey Wohl, Claire Hoffman and Peter Cooper (Paul Hastings, LLP-	.50	\$62.50

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	California) regarding Declined Deposition Date and Protective Order		
	<b>TOTAL FOR PARALEGALS</b>	<b>30.5</b>	<b>\$3,812.50</b>
Law Clerks \$150	Legal research re FLSA exemptions	6.75	\$1012.50
	<b>TOTAL FOR LAW CLERKS</b>		<b>\$1,012.50</b>